

UNITED STATES DISTRICT COURT

for the
 Central District of California

In the Matter of the Search of)
 (Briefly describe the property to be searched or identify the)
 person by name and address))

Four USPS Priority Mail Express parcels and five)
 USPS Priority Mail parcels currently secured at the)
 USPIS Task Force Office located at the Chino Police)
 Station, 5450 Guardian Way, Chino, California)

Case No. 5:24-MJ-00020

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment A

located in the Central District of California, there is now concealed (identify the person or describe the property to be seized):

See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section
 21 U.S.C. §§ 841(a)(1), and 843(b)

Offense Description
 See attached affidavit

The application is based on these facts:

See attached Affidavit

☒ Continued on the attached sheet.

☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

 Applicant's signature

USPIS Task Force Officer, Zachary Sumpter

 Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: _____

 Judge's signature

City and state: Riverside, CA

Honorable Shashi H. Kewalramani, U.S. Magistrate Judge

 Printed name and title

AUSA: Mitchell Suliman (951-276-6026)

AFFIDAVIT

I, Zachary Sumpter, being duly sworn, declare and state as follows:

I. TRAINING AND EXPERIENCE

1. I am a Task Force Officer ("TFO") with the United States Postal Inspection Service ("USPIS") and have been so since November 2021. I am currently assigned as a TFO to the Contraband Interdiction and Investigations South Team of the Los Angeles Division, which is responsible for investigating drug trafficking involving the United States Mail. Accordingly, I am an "investigative or law enforcement officer" of the United States within the meaning of Title 18, United States Code, Section 2510(7). Specifically, I am an officer of the United States empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 18, United States Code, Section 2516. Prior to being assigned as a TFO with the USPIS, I worked patrol as a full-time sworn law enforcement officer with the Chino Police Department. I have been a sworn law enforcement officer since August 2013. I am a Police Officer within the meaning of California Penal Code § 830.1.

2. I have received training and have experience investigating violations of state and federal narcotics and money laundering laws, including, but not limited to Title 21, United States Code, Sections 841, 846, 952, 959 and 963 and Title 18, United States Code, Section 1956(a). I have been involved in various electronic surveillance methods including state and federal wiretap investigations, the debriefing of

informants and witnesses, as well as others who have knowledge of the manufacturing, distribution, transportation, storage, and importation of controlled substances and the laundering of drug proceeds.

3. I have participated in many aspects of drug investigations, including investigations into the smuggling of illegal drugs, money laundering, and extortion related to drug trafficking. I am familiar with narcotics traffickers' methods of operation, including the manufacturing, storage, transportation, and distribution of narcotics, the collection of money that represents the proceeds of narcotics trafficking, and money laundering. I am also familiar with the manner in which narcotics traffickers transport and distribute narcotics in areas they control. I am familiar with how drug traffickers utilize counter-surveillance techniques to avoid detection by law enforcement. I also know that drug traffickers often communicate with their drug-trafficking associates through the use of cellular telephones. I have become aware that more sophisticated drug trafficking networks now utilize the dark web, Voice over Internet Protocol, video chat, internet messaging services, and social networking sites to communicate with one another. During drug-related communications, traffickers often use coded or cryptic language to disguise the drug-related nature of their conversations.

II. PURPOSE OF AFFIDAVIT

4. This affidavit is made in support of a search warrant for the SUBJECT PARCELS described below in paragraph 6 and

Attachment A, for the items listed in paragraph 7 and Attachment B. The items to be seized constitute the fruits, instrumentalities, and evidence of violations of Title 21, United States Code, Sections 841(a)(1) (Possession with Intent to Distribute a Controlled Substance) and 843(b) (Unlawful Use of a Communication Facility (including the mails) to Facilitate the Distribution of a Controlled Substance).

5. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. The affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

III. PARCELS TO BE SEARCHED

6. This affidavit is made in support of an application for a search warrant for the following four United States Postal Service ("USPS") Priority Mail Express parcels and five USPS Priority Mail parcels (hereinafter referred to as the "SUBJECT PARCELS"). All the SUBJECT PARCELS are currently secured at the USPIS Task Force Office located at the Chino Police Station, 5450 Guardian Way, Chino, California. The addresses listed below are written as they appear on the packages:

a. SUBJECT PARCEL 1 is a United States Postal Service Priority Mail parcel bearing tracking number 9505 5125

9621 4009 1898 09. SUBJECT PARCEL 1 is a white colored, large-sized USPS Mailing Box addressed to "Manny Solano, 815 N. Campus Ave, Ontario CA 91764." The return address listed on SUBJECT PARCEL 1 is "Jose Gutierrez, 1800 HAWAII Ave, Alamogordo N.M 88310." SUBJECT PARCEL 1 was postmarked on January 9, 2024, in the 88310 ZIP code.

b. SUBJECT PARCEL 2 is a United States Postal Service Priority Mail parcel bearing tracking number 9505 5125 5188 4008 4916 84. SUBJECT PARCEL 2 is a white colored, medium-sized USPS Flat Rate Box addressed to "Ana Maria, 8804 Catawba ave, Fontana 92335 CA." The return address listed on SUBJECT PARCEL 2 is "Miguel Delgado, 510 e State, Marshalltown 50158 IA." SUBJECT PARCEL 2 was postmarked on January 8, 2024, in the 46234 ZIP code.

c. SUBJECT PARCEL 3 is a United States Postal Service Priority Mail parcel bearing tracking number 9505 5125 5188 4008 4914 17. SUBJECT PARCEL 3 is a white colored, medium-sized USPS Flat Rate Box addressed to "Ana Maria, 8804 CATAWBA ave, Fontana 92335 CA." The return address listed on SUBJECT PARCEL 3 is "Miguel Delgado, 510 e State, Marshalltown 50158 IA." SUBJECT PARCEL 3 was postmarked on January 8, 2024, in the 50158 ZIP code.

d. SUBJECT PARCEL 4 is a United States Postal Service Priority Mail parcel bearing tracking number 9505 5147 9646 4008 3443 54. SUBJECT PARCEL 4 is a white colored, large-sized USPS Flat Rate Box addressed to "wendell Stewart, 7925 Hemingway ct, fontana Ca 92336." The return address listed on

SUBJECT PARCEL 4 is "RaeShawn Mansfield, 926 west 37th street, 37410, Chattanooga, TN." SUBJECT PARCEL 4 was postmarked on January 8, 2024, in the 37409 ZIP code.

e. SUBJECT PARCEL 5 is a United States Postal Service Priority Mail parcel bearing tracking number 9505 5147 9647 4008 7000 36. SUBJECT PARCEL 5 is a white colored, large-sized USPS Flat Rate Box addressed to "Wendell Stewart, 7925 Hemingway ct, fontana, Ca 92336." The return address listed on SUBJECT PARCEL 5 is "RaeShawn Mansfield, 926 west 37th Street, 37410, Chattanooga, TN." SUBJECT PARCEL 5 was postmarked on January 8, 2024, in the 37409 ZIP code.

f. SUBJECT PARCEL 6 is a United States Postal Service Priority Mail Express parcel bearing tracking number EI 405 684 223 US. SUBJECT PARCEL 6 is a white colored, medium-sized USPS Mailing Box addressed to "Natalie Perez, 18047 beach blvd #2070, huntington beach, cal, 92648." The return address listed on SUBJECT PARCEL 6 is "N. Smith, P.O. Box 31, B.R.F, WI, 54615." SUBJECT PARCEL 6 was postmarked on November 07, 2023, in the 70515 ZIP code.

g. SUBJECT PARCEL 7 is a United States Postal Service Priority Mail Express parcel bearing tracking number EI 159 568 338 US. SUBJECT PARCEL 7 is a brown colored, large-sized USPS ReadyPost box addressed to "Cameron H., 1105 S Euclid st ste D, P.O. BOX 370 Fullerton, CA, 92832." The return address listed on SUBJECT PARCEL 7 is "Caidence, marrison, 3015 nvtmeg ct, ROCKingham, VA 22801." SUBJECT PARCEL 7 was postmarked on January 9, 2024, in the 22802 ZIP code.

h. SUBJECT PARCEL 8 is a United States Postal Service Priority Mail Express parcel bearing tracking number EJ 666 466 528 US. SUBJECT PARCEL 8 is a brown colored, large-sized USPS ReadyPost box addressed to "William Rashford, 655 S. Main st suite 200-217, Orange CA, 92868." The return address listed on SUBJECT PARCEL 8 is "Sherrie Long, 22516 felch st, Warrensville Hts, OH 44128." SUBJECT PARCEL 8 was postmarked on January 11, 2024, in the 44125 ZIP code.

i. SUBJECT PARCEL 9 is a United States Postal Service Priority Mail Express parcel bearing tracking number EI 369 769 975 US. SUBJECT PARCEL 9 is a white colored, large-sized USPS Flat Rate box addressed to "Silverio Martinez JR, 31031 9th st, Nuevo, CA 92567." The return address listed on SUBJECT PARCEL 9 is "Javier Goldilla, UCrb Los Colobos Park, Calle Olmo, Carolina PR 00987." SUBJECT PARCEL 9 was postmarked on January 10, 2024, in the 00983 ZIP code.

IV. ITEMS TO BE SEIZED

7. The items to be seized from the SUBJECT PARCELS constitute fruits, instrumentalities, and evidence of violations of Title 21, United States Code, Sections 841(a)(1) (Possession with Intent to Distribute a Controlled Substance) and 843(b) (Unlawful Use of a Communication Facility (including the mail) to Facilitate the Distribution of a Controlled Substance). The items to be seized are identified in Attachment B and are incorporated herein by reference.

V. STATEMENT OF PROBABLE CAUSE

A. Background

8. As described in detail below, the SUBJECT PARCELS are all inbound parcels to the greater San Bernardino and Orange County areas from multiple regions of the United States and were selected for investigation because they met certain criteria common to packages containing contraband. The SUBJECT PARCELS are believed to contain controlled substances or the proceeds from the trafficking of controlled substances based on, among other things, positive alerts by a trained narcotics-detection canine.

9. Based on my training and discussions with experienced Postal Inspectors, I know that Postal Inspectors have been conducting investigations of drug trafficking via USPS Express Mail and Priority Mail since the mid-1980s. In particular, they began conducting organized interdictions of Express Mail and Priority Mail parcels suspected of containing controlled substances and proceeds from the sale of controlled substances in Los Angeles, California, in the early 1990s. Along with conducting organized interdictions, Postal Inspectors also regularly examine and investigate Express Mail and Priority Mail parcels throughout the year. During the 1990s, Postal Inspectors observed that the trend was for drug traffickers to send controlled substances and proceeds from the sale of controlled substances using boxes, with the proceeds in the form of cash. Although Postal Inspectors still see the use of boxes for controlled substances and cash, there has been a gradual

change over the years toward the current trend of smaller boxes, flat cardboard envelopes, and Tyvek envelopes, with proceeds from the sale of controlled substances converted to money orders. By using money orders, drug traffickers are able to send large dollar amounts in compact form, using much smaller conveyances that lend a sense of legitimacy to the parcel.

10. From my training, personal experience, and the collective experiences related to me by Postal Inspectors on my team who specialize in investigations relating to the mailing of controlled substances and drug proceeds, I am aware that the greater Los Angeles area is a major source area for controlled substances. As such, controlled substances are frequently transported from the greater Los Angeles area via the United States Mail, and the proceeds from the sale of the controlled substances are frequently returned to the greater Los Angeles area via the United States Mail. These proceeds are generally in large amounts of money over \$1,000.

11. I also know based on my training and experience that drug traffickers will often use one of two USPS services -- Priority Mail Express Service, which is the overnight/next day delivery mail service, and Priority Mail Service, which is the two-to-three day delivery mail service. Drug traffickers use Priority Mail Express delivery services because of their speed, reliability, and the ability to track the package's progress to the intended delivery point. Drug traffickers often use Priority Mail delivery services because they allow drug traffickers more time for travel between states if they are

following their shipments to their destinations for distribution. Like Priority Mail Express, Priority Mail also allows drug traffickers to track the package's progress to the intended delivery point.

12. Based on information derived and built upon over many years, I, like other Postal Inspectors and Task Force Officers, initially look for certain characteristics when examining Priority Mail Express and Priority Mail for controlled substances or drug proceeds. These characteristics include:

a. The article is contained in a box, flat cardboard mailer, or Tyvek envelope;

b. The article bears a handwritten label; and/or

c. The handwritten label on the article does not contain a business account number.

13. Parcels found to meet these characteristics are scrutinized by Postal Inspectors and Task Force Officers through further investigation, which may include return and addressee address verifications and trained narcotics-detecting canine examination. Postal Inspectors and Task Force Officers will also look for additional drug or drug proceed parcel characteristics such as:

a. The seams of the article are taped or glued shut;

b. The article emits the odor of a cleaning agent, adhesive, or spray foam, detectable by a human; and/or

c. Multiple articles are mailed to the same individual, on the same day, from different locations.

14. Based on my training and experiences and information learned during discussions with Postal Inspectors, I know that drug traffickers often use fictitious or incomplete names and/or addresses in an effort to conceal their identity from law enforcement. Indeed, it is my experience that when real addresses are used, it is only to lend a legitimate appearance to the parcel and is almost always paired with a false name.

B. Investigation of the SUBJECT PARCELS

15. Between January 9, 2024, and January 12, 2024, during routine parcel inspections at the City of Industry USPS Processing and Distribution Center, the SUBJECT PARCELS were identified as meeting some of the initial suspicious characteristics described above in paragraphs 12 and 13.

16. Upon inspecting the SUBJECT PARCELS, I observed that the parcels were each consistent with the size, shape, and appearance of parcels previously identified in other investigations that contained controlled substances or drug proceeds. Furthermore, SUBJECT PARCELS 4, 5, 7, 8 and 9 were all mailed from a postal facility inconsistent with the zip code listed for the sender. Based on my training and experience, I know that drug traffickers will often mail parcels from postal facilities other than those which are located in their respective ZIP code to attempt to disguise themselves as being associated with the parcel.

17. After being identified, each SUBJECT PARCEL was removed from the mail stream and additional investigation was conducted.

18. The SUBJECT PARCELS are currently in the custody of the USPIS and secured at the USPIS Task Force Office located at the Chino Police Station, 5450 Guardian Way, Chino, California, 91710, pending a search of their contents pursuant to obtaining a search warrant.

C. Investigation of SUBJECT PARCELS Including Use of the Accurint Database Checks

19. On January 16, 2024, I examined the SUBJECT PARCELS and conducted an Accurint¹ database check using the sender and recipient information listed on the SUBJECT PARCELS and learned the following:

a. SUBJECT PARCEL 1 has a handwritten label in ink and does not contain a business account number, which based on my training and experience is common in parcels used by narcotic traffickers. According to Accurint database records, the return address information listed on SUBJECT PARCEL 1 is associated with the listed sender "Jose Gutierrez." Based on an Accurint database check, the listed recipient, "Manny Solano," is associated with the listed recipient address on SUBJECT PARCEL 1.

b. SUBJECT PARCEL 2 is wrapped in copious amounts of clear tape and has a handwritten label in ink, which based on my training and experience is common in parcels used by narcotic traffickers. According to Accurint database records, the return address information listed on SUBJECT PARCEL 2 is associated

¹ ACCURINT is a public information database used by law enforcement that collects personal identifying information like names, addresses and telephone numbers.

with the listed sender "Miguel Delgado." Based on an Accurint database check, the listed recipient, "Ana Maria," is associated with the listed recipient address on SUBJECT PARCEL 2.

c. SUBJECT PARCEL 3 is wrapped in copious amounts of clear tape on all its seams and has a handwritten label in ink, which based on my training and experience is common in parcels used by narcotic traffickers. According to Accurint database records, the return address information listed on SUBJECT PARCEL 3 is associated with the listed sender "Miguel Delgado." Based on an Accurint database check, the listed recipient, "Ana Maria," is associated with the listed recipient address on SUBJECT PARCEL 3.

d. SUBJECT PARCEL 4 is wrapped in clear tape and has a handwritten label in ink, which based on my training and experience is common in parcels used by narcotic traffickers. According to Accurint database records, the return address information listed on SUBJECT PARCEL 4 is associated with the listed sender "RaeShawn Mansfield." Based on an Accurint database check, the listed recipient, "Wendell Stewart," is associated with the listed recipient address on SUBJECT PARCEL 4.

e. SUBJECT PARCEL 5 is wrapped in clear tape and has a handwritten label in ink, which based on my training and experience is common in parcels used by narcotic traffickers. According to Accurint database records, the return address information listed on SUBJECT PARCEL 5 is associated with the listed sender "RaeShawn Mansfield." Based on an Accurint

database check, the listed recipient, "Wendell Stewart," is associated with the listed recipient address on SUBJECT PARCEL 5.

f. SUBJECT PARCEL 6 has a handwritten label in ink and does not contain a business account number, which based on my training and experience is common in parcels used by narcotic traffickers. According to Accurint database records, the return address information listed on SUBJECT PARCEL 6 is not associated with the listed sender "N. Smith." Based on an Accurint database check, the listed recipient, "Natalie Perez," is not associated with the listed recipient address on SUBJECT PARCEL 6.

g. SUBJECT PARCEL 7 is wrapped in copious amounts of clear tape on all its seams and has a handwritten label in ink, which based on my training and experience is common in parcels used by narcotic traffickers. According to Accurint database records, the return address information listed on SUBJECT PARCEL 7 is not associated with the listed sender "Caidence, marrison." Based on an Accurint database check, the listed recipient, "Cameron H.," is not associated with the listed recipient address on SUBJECT PARCEL 7.

h. SUBJECT PARCEL 8 is wrapped in copious amounts of clear tape on all its seams and has a handwritten label in ink, which based on my training and experience is common in parcels used by narcotic traffickers. According to Accurint database records, the return address information listed on SUBJECT PARCEL 8 is associated with the listed sender "Sherrie Long." Based on

an Accurint database check, the listed recipient, "William Rashford," is not associated with the listed recipient address on SUBJECT PARCEL 8.

i. SUBJECT PARCEL 9 is wrapped in copious USPS blue and clear tape on all its seams and has a handwritten label in ink, which based on my training and experience is common in parcels used by narcotic traffickers. According to Accurint database records, the return address information listed on SUBJECT PARCEL 9 is associated with the listed sender "Javier Goldilla." Based on an Accurint database check, the listed recipient, "Silverio Martinez JR," is not associated with the listed recipient address on SUBJECT PARCEL 9.

D. Positive Canine Alert on the SUBJECT PARCELS

20. On January 16, 2023, Chino Police Department Officer Angel Bran and his certified narcotics-detection canine, "Cyra", conducted an exterior examination of each of the SUBJECT PARCELS 1 through 9. The exterior examinations were conducted separately. Officer Bran informed me that Cyra gave a positive alert to each of the SUBJECT PARCELS, 1 through 9, indicating the presence of controlled substances or other items that emitted the odor of controlled substances, in the SUBJECT PARCELS. Attached hereto as Exhibit 1, which I incorporate fully herein by reference, is a document setting forth information provided by Officer Bran regarding Cyra's training and history in detecting controlled substances, and examination of SUBJECT PARCELS 1 through 9.

VI. CONCLUSION

21. Based on the above, I believe there is probable cause to believe that the items listed in Attachment B, which constitute evidence, fruits and instrumentalities of violations of Title 21, United States Code, Sections 841(a)(1) (Possession with Intent to Distribute a Controlled Substance) and 843(b) (Unlawful Use of a Communication Facility (including the mails) to Facilitate the Distribution of a Controlled Substance) will be found in the SUBJECT PARCELS, as described in Attachment A.

Attested to by the applicant in
accordance with the requirements
of Fed. R. Crim. P. 4.1 by
telephone on this ____ day of
January 2023.

UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

PARCELS TO BE SEARCHED

SUBJECT PARCELS 1 through 9 (collectively the "SUBJECT PARCELS") which are currently secured at the USPIS Task Force Office located at the Chino Police Station, 5450 Guardian Way, Chino, California:

a. SUBJECT PARCEL 1 is a United States Postal Service Priority Mail parcel bearing tracking number 9505 5125 9621 4009 1898 09. SUBJECT PARCEL 1 is a white colored, large-sized USPS Mailing Box addressed to "Manny Solano, 815 N. Campus Ave, Ontario CA 91764." The return address listed on SUBJECT PARCEL 1 is "Jose Gutierrez, 1800 HAWAII Ave, Alamogordo N.M 88310." SUBJECT PARCEL 1 was postmarked on January 9, 2024, in the 88310 ZIP code.

b. SUBJECT PARCEL 2 is a United States Postal Service Priority Mail parcel bearing tracking number 9505 5125 5188 4008 4916 84. SUBJECT PARCEL 2 is a white colored, medium-sized USPS Flat Rate Box addressed to "Ana Maria, 8804 Catawba ave, Fontana 92335 CA." The return address listed on SUBJECT PARCEL 2 is "Miguel Delgado, 510 e State, Marshalltown 50158 IA." SUBJECT PARCEL 2 was postmarked on January 8, 2024, in the 46234 ZIP code.

c. SUBJECT PARCEL 3 is a United States Postal Service Priority Mail parcel bearing tracking number 9505 5125 5188 4008 4914 17. SUBJECT PARCEL 3 is a white colored, medium-sized USPS Flat Rate Box addressed to "Ana Maria, 8804 CATAWBA ave, Fontana 92335 CA." The return address listed on SUBJECT

PARCEL 3 is "Miguel Delgado, 510 e State, Marshalltown 50158 IA." SUBJECT PARCEL 3 was postmarked on January 8, 2024, in the 50158 ZIP code.

d. SUBJECT PARCEL 4 is a United States Postal Service Priority Mail parcel bearing tracking number 9505 5147 9646 4008 3443 54. SUBJECT PARCEL 4 is a white colored, large-sized USPS Flat Rate Box addressed to "wendell Stewart, 7925 Hemingway ct, fontana Ca 92336." The return address listed on SUBJECT PARCEL 4 is "RaeShawn Mansfield, 926 west 37th street, 37410, Chattanooga, TN." SUBJECT PARCEL 4 was postmarked on January 8, 2024, in the 37409 ZIP code.

e. SUBJECT PARCEL 5 is a United States Postal Service Priority Mail parcel bearing tracking number 9505 5147 9647 4008 7000 36. SUBJECT PARCEL 5 is a white colored, large-sized USPS Flat Rate Box addressed to "Wendell Stewart, 7925 Hemingway ct, fontana, Ca 92330." The return address listed on SUBJECT PARCEL 5 is "RaeShawn Mansfield, 926 west 37th Street, 37410, Chattanooga, TN." SUBJECT PARCEL 5 was postmarked on January 8, 2024, in the 37409 ZIP code.

f. SUBJECT PARCEL 6 is a United States Postal Service Priority Mail Express parcel bearing tracking number EI 405 684 223 US. SUBJECT PARCEL 6 is a white colored, medium-sized USPS Mailing Box addressed to "Natalie Perez, 18047 beach blvd #2070, huntington beach, cal, 92648." The return address listed on SUBJECT PARCEL 6 is "N. Smith, P.O. Box 31, B.R.F, WI, 54615." SUBJECT PARCEL 6 was postmarked on November 7, 2023, in the 70515 ZIP code.

g. SUBJECT PARCEL 7 is a United States Postal Service Priority Mail Express parcel bearing tracking number EI 159 568 338 US. SUBJECT PARCEL 7 is a brown colored, large-sized USPS ReadyPost box addressed to "Cameron H., 1105 S Euclid st ste D, P.O. BOX 370 Fullerton, CA, 92832." The return address listed on SUBJECT PARCEL 7 is "Caidence, marrison, 3015 nvtmeg ct, ROCKingham, VA 22801." SUBJECT PARCEL 7 was postmarked on January 9, 2024, in the 22802 ZIP code.

h. SUBJECT PARCEL 8 is a United States Postal Service Priority Mail Express parcel bearing tracking number EJ 666 466 528 US. SUBJECT PARCEL 8 is a brown colored, large-sized USPS ReadyPost box addressed to "William Rashford, 655 S. Main st suite 200-217, Orange CA, 92868." The return address listed on SUBJECT PARCEL 8 is "Sherrie Long, 22516 felch st, Warrensville Hts, OH 44128." SUBJECT PARCEL 8 was postmarked on January 11, 2024, in the 44125 ZIP code.

i. SUBJECT PARCEL 9 is a United States Postal Service Priority Mail Express parcel bearing tracking number EI 369 769 975 US. SUBJECT PARCEL 9 is a white colored, large-sized USPS Flat Rate box addressed to "Silverio Martinez JR, 31031 9th st, Nuevo, CA 92567." The return address listed on SUBJECT PARCEL 9 is "Javier Goldilla, UCrb Los Colobos Park, Calle Olmo, Carolina PR 00987." SUBJECT PARCEL 9 was postmarked on January 10, 2024, in the 00983 ZIP code.

ATTACHMENT B

ITEMS TO BE SEIZED

1. The following are the items to be seized from SUBJECT PARCELS 1 through 9, which constitute the fruits, instrumentalities, and evidence of violations of Title 21, United States Code, Sections 841(a)(1) (Distribution and Possession with Intent to Distribute a Controlled Substance) and 843(b) (Unlawful Use of a Communication Facility (including the mails) to Facilitate the Distribution of a Controlled Substance):

- a. Any controlled substances, including marijuana;
- b. Currency, money orders, bank checks, or similar monetary instruments in aggregate quantities over \$1,000; and
- c. Any associated packaging.

Exhibit 1

①

AFFIDAVIT

HANDLER ANGEL BRAN AND K9 "CYRA"

I, **Officer Angel Bran**, I have been a Peace Officer since 2013 and have been present at hundreds of drug investigations since the start of my career. I have received formal training from the San Bernardino County Sheriff's Department, Chino Police Department and the California Narcotic Officers' Association on drug recognition and symptomology.

I attended the Adlerhorst Police Dog Handler Course in June 2019 with **Police Service Dog (PSD) Cyra**. I received 240 hours of instruction in basic police dog handling skills. PSD Cyra and I were certified as a patrol team in August 2019. In August 2020, PSD Cyra and I attended the Adlerhorst Police Dog School Drug Detection Class. During this course, PSD Cyra and I receive 240 hours of instruction in the detection of the odor of illegal drugs. In September 2020, PSD Cyra and I passed a certification test in the detection of the odor of illegal drugs. During this course, I personally observed PSD Cyra alert to the presence of the odor of an illegal drug. I am familiar and knowledgeable in the behavior's PSD Cyra engages in when she detects the odor of illegal drugs.

In September 2021, 2022, and 2023 PSD Cyra and I were certified as a patrol team (patrol operations and drug detection) by the Los Angeles County Police Canine Association. In November of 2020, PSD Cyra and I were certified in patrol operations by Adlerhorst. I do continual training with PSD Cyra through Adlerhorst International and out in the field during patrol or training sites hosted by different police departments. The training includes various hiding locations including, but not limited to: vehicles, buildings, bags, parcels, and open areas. This training also includes proofing PSD Cyra on novel odors such as: plastic, boxes, latex, tape, metal, money (circulated and uncirculated) and food. I also proof PSD Cyra off my human odor. This training is on-going and continual.

On 1-16-24 @ 2300, Postal Inspector Sumpter asked the assistance of PSD Cyra and I in a narcotic parcel investigation. PSD Cyra alerted to the presence of the odor of an illegal drug emitting from the following:

USPS parcel: 9505 5125 9621 4009 1898 09

Addressed to: MANNY SOLANO
815 N. CAMPUS AVE
ONTARIO CA 91764


 K9 Officer Angel Bran ID#3655
 Chino Police Department

②

AFFIDAVIT

HANDLER ANGEL BRAN AND K9 "CYRA"

I, **Officer Angel Bran**, I have been a Peace Officer since 2013 and have been present at hundreds of drug investigations since the start of my career. I have received formal training from the San Bernardino County Sheriff's Department, Chino Police Department and the California Narcotic Officers' Association on drug recognition and symptomology.

I attended the Adlerhorst Police Dog Handler Course in June 2019 with **Police Service Dog (PSD) Cyra**. I received 240 hours of instruction in basic police dog handling skills. PSD Cyra and I were certified as a patrol team in August 2019. In August 2020, PSD Cyra and I attended the Adlerhorst Police Dog School Drug Detection Class. During this course, PSD Cyra and I receive 240 hours of instruction in the detection of the odor of illegal drugs. In September 2020, PSD Cyra and I passed a certification test in the detection of the odor of illegal drugs. During this course, I personally observed PSD Cyra alert to the presence of the odor of an illegal drug. I am familiar and knowledgeable in the behavior's PSD Cyra engages in when she detects the odor of illegal drugs.

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On 1-16-24 @ 2302, Postal Inspector Sumpter asked the assistance of PSD Cyra and I in a narcotic parcel investigation. PSD Cyra alerted to the presence of the odor of an illegal drug emitting from the following:

USPS parcel: 9505 5125 5188 4008 4916 84

Addressed to: ANA MAZZA
8804 CATAWBA AVE
FONTANA CA 92335


K9 Officer Angel Bran ID#3655
Chino Police Department

③

AFFIDAVIT

HANDLER ANGEL BRAN AND K9 "CYRA"

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On 1-16-24 @ 2304, Postal Inspector Sumpter asked the assistance of PSD Cyra and I in a narcotic parcel investigation. PSD Cyra alerted to the presence of the odor of an illegal drug emitting from the following:

USPS parcel: 9505 5125 5188 4008 4914 17

Addressed to: ANA MARIA
8804 CATANBA AVE
FONTANA CA 92335


 K9 Officer Angel Bran ID#3655
 Chino Police Department

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On 1-16-24 @ 2306, Postal Inspector Sumpter asked the assistance of PSD Cyra and I in a narcotic parcel investigation. PSD Cyra alerted to the presence of the odor of an illegal drug emitting from the following:

USPS parcel: 9505 5147 9646 4008 3443 54

Addressed to: WENDELL STEWART
7925 HEMINGWAY CT
FONTANA CA 92736


 K9 Officer Angel Bran ID#3655
 Chino Police Department

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On 1-16-24 @ 2308, Postal Inspector Sumpter asked the assistance of PSD Cyra and I in a narcotic parcel investigation. PSD Cyra alerted to the presence of the odor of an illegal drug emitting from the following:

USPS parcel: 9505 5147 9647 4008 7000 36

Addressed to: WENDELL STEWART
7925 HEMINGWAY CT
FONTANA CA 92336



K9 Officer Angel Bran ID#3655
 Chino Police Department

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On 1-16-24 @ 2310, Postal Inspector Sumpter asked the assistance of PSD Cyra and I in a narcotic parcel investigation. PSD Cyra alerted to the presence of the odor of an illegal drug emitting from the following:

USPS parcel: EI 405 684 223 u.s.

Addressed to: NATALIE PEREZ
18047 BEACH BLVD #2070
HUNTINGTON BEACH CAL 92648


K9 Officer Angel Bran ID#3655
Chino Police Department

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On 1-16-24 @ 2312, Postal Inspector Sumpter asked the assistance of PSD Cyra and I in a narcotic parcel investigation. PSD Cyra alerted to the presence of the odor of an illegal drug emitting from the following:

USPS parcel: EI 159 568 338 nJ

Addressed to: Cameron H.
1105 S ENCLID ST STE D
PO Box 370 Fullerton CA 92832



K9 Officer Angel Bran ID#3655
 Chino Police Department

8

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On 1-16-24 @ 2314, Postal Inspector Sumpter asked the assistance of PSD Cyra and I in a narcotic parcel investigation. PSD Cyra alerted to the presence of the odor of an illegal drug emitting from the following:

USPS parcel: EJ 666 466 528 u)

Addressed to: WILLIAM RASHFORD
655 S. MAIN ST. SUITE 200-217
ORANGE CA 92868



K9 Officer Angel Bran ID#3655
Chino Police Department

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On 1-16-24 @ 2316, Postal Inspector Sumpter asked the assistance of PSD Cyra and I in a narcotic parcel investigation. PSD Cyra alerted to the presence of the odor of an illegal drug emitting from the following:

USPS parcel: EI 369 769 975 US

Addressed to: SILVANO MARTINEZ JR
31032 9TH ST
NEWEO CA 92567

K9 Officer Angel Bran ID#3655
 Chino Police Department